



ARCHITECTS' COUNCIL OF EUROPE
CONSEIL DES ARCHITECTES D'EUROPE

Ref: 196/06/AJ/dd
Date 15th June 2006

Practice of the Profession

Public Consultation on the Future of the Internal Market

Statement by the ACE

Draft Final

PRIVACY STATEMENT

The ACE accepts that this reply can be published on the website of the Commission

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The Architects' Council of Europe (ACE) is the European Representative Organisation for the architectural profession. It has 42 Member Organisations drawn from 31 European Countries that include all 25 Member States of the EU. The ACE represents, through its Members, about 450 000 practising architects.

Introduction

The architectural profession is supportive of the objectives of creating a coherent and efficiently functioning Internal Market within the European Union. In fact, the architectural profession is one of the most mobile of the liberal professions and the work of the profession has significantly aided the creation of European culture, identity and prosperity. As such the profession is concerned about the future of Internal Market Policy and it offers the following comments on the occasion of the Public Consultation on the Future of the Internal Market launched by the European Commission in 2006. The ACE offers general remarks relevant to the architectural profession rather than answering the proscribed questions included in the Consultation Document :

1. The ACE is concerned that Internal Market Policy does not take adequate account of the Gothenburg declaration and the Sustainable Development Strategy of the EU. The over emphasis on encouraging growth and creating jobs is potentially detrimental to the other crucial pillars of sustainability which are societal and environmental impacts. The ACE firmly believes that if the Internal Market is to be truly effective so that the EU becomes a true world leader then the integration of the Lisbon Agenda Focus on Growth and Jobs with the Gothenburg Declaration focus on sustainability currently under review needs to be effectively put in place.
2. Rather than continuously emphasising the growth agenda the ACE believes that much work needs to be done in consolidating and implementing existing policy and legislation in the Internal Market. For architectural services the current process towards the adoption a Directive on Services in the Internal Market is supported by the ACE on the basis that the comments made in point 1 above are adequately taken into account.
3. There is a need, in the view of the ACE, for the Directorate General Internal Market and Services to take more account of the policies of other related Directorates General, in a more cross-policy approach. In particular, in the desire to encourage innovation in the Internal Market, the ACE believes that further focus on, for example, the Environmental Technologies Action Plan would

significantly benefit the internal market and would help to lead the European Union to be the true world leader in business and economic growth.

4. The recent undermining of confidence in the security of energy supply must be addressed in future internal market policy. The internal market cannot function without energy to drive jobs and growth and the European Union, being weak in natural sources of traditional fossil fuels for energy production must turn to renewable resources urgently. The ACE believes that the internal market policy should be co-ordinated with other Commission policy in the field of energy use and efficiency, in order to direct it towards encouraging the growth and development of sustainable renewable energy as a matter of priority.
5. The ACE agrees that innovation is a crucial factor for future success in implementing internal market policy. As a demonstration of this fact the ACE has, since 1995, been actively involved in the European Council for Construction Research, Development and Innovation (ECCREDI), which was the main impetus behind the foundation of the European Construction Technology Platform.
6. In carrying out Public Consultations and evaluations the ACE believes that the European Commission must listen more attentively to the actors in the field and to affected stakeholders. In the opinion of the ACE one of the main goals for the internal market should be to improve the overall quality of life of European citizens. Therefore this goal must not focus simply on economic reasoning but must take a holistic approach to economic, social, cultural and environmental aspects. The introduction of a broader range of criteria based on these four characteristics in both ex ante and ex post evaluations would be most useful.
7. The ACE is disappointed with the proposed chapter in the Services Directive that deals with the quality of services. It believes that stronger leadership on how undertakings can improve the quality of the services they provide needs to be given by the Internal Market Directorate General. In the view of the ACE standardisation of services is not the panacea in this topic and any move towards the creation of benchmarking of service provision must be very carefully considered prior to the imposition of standards in this area, while ensuring a high level of consistency of standards. A significant concern in this subject is the high cost of existing systems for quality assurance, which means that small and medium enterprises are effectively excluded from the possibility of having certification to assist them in trying to enter new markets. For architectural services this is particularly the case as the vast majority of undertakings employ less than 5 persons.
8. In the view of the ACE a particularly crucial element in internal market policy that leads to quality in the provision of architectural services, is the effectiveness of the mutual recognition of professional qualifications. In this respect, the ACE is concerned that, for the architectural profession, the recently adopted directive on recognition of professional qualifications has, de facto, changed the *acquis communautaire* so as to weaken the possibility for qualifications of architects to be challenged by Member States. This matter needs to be addressed so as to ensure that the existing high levels of qualifications for architects is maintained.

Summary and conclusion

In summary the ACE firmly believes that an important goal – possibly the prime goal - of internal market policy should be to ensure a high, sustainable, quality of life for all citizens and all businesses within the European Union. This will require more integrated approaches that merge the objectives of Lisbon and Gothenburg Agendas in a coherent framework.

The ACE is at the disposal of the DG Internal Market to further elaborate on the ideas included in this paper should such an elaboration be desired.

End of Statement